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JOINT STIPULATION AND [proposed] ORDER EXTENDING DEADLINE FOR JOINING ADDITIONAL PARTIES (C17-01794-JLR) - 1

The Honorable James L. Robart

UNITED STATED DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

PAUL LAMBERTSON, MICHELLE LAMBERTSON, and their marital community,

Plaintiffs,

VS.

FLORIM USA, INC., a Tennessee Corporation,

Defendant.

NO. C17-01794-JLR

JOINT STIPULATION AND [proposed]
ORDER EXTENDING DEADLINE FOR
JOINING ADDITIONAL PARTIES

NOTE FOR CONSIDERATION: March 22, 2018

STIPULATION

Plaintiffs, by and through their counsel, Keith A. Kemper, and Defendant, Florim USA, Inc., by and through its counsel, Shaunta M. Knibb, come before this Court pursuant to Local Rule 10(g), and hereby jointly stipulate and ask for an Order amending the case schedule as follows:

On February 22, 2018, the Court issued a Minute Order Setting Trial Dates and Related Dates. *See* Dkt. No. 11. Pursuant to that Order, the deadline for joining additional parties is March 22, 2018. However, the case is still a substantial period from trial and the parties are still engaged in the initial rounds of discovery. Because it is possible that in the course of discovery the parties may find that other entities or parties might bear responsibility, the parties hereby request this Court to delay, for a reasonable period, the deadline for adding parties.

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NOW THEREFORE, the parties, through their respective counsel of record, do hereby stipulate and agree, and respectfully request, that the Court make and enter the following order:

- 1. The deadline for joining additional parties is hereby extended from March 22, 2018 until June 1, 2018.
- 2. All other deadlines in the Court's February 22, 2018 Minute Order shall remain the same.

SO STIPULATED.

DATED this 22nd day of March, 2018.

ELLIS, LI & McKINSTRY PLLC

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Attorneys for Plaintiffs

SO STIPULATED.

DATED this 22nd day of March, 2018.

SMYTH & MASON, PLLC

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JOINT STIPULATION AND [preposed] ORDER EXTENDING DEADLINE FOR JOINING ADDITIONAL PARTIES (C17-01794-JLR) - 2

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ORDER

IT IS SO ORDERED.

DATED this $\underline{\mathfrak{A}}^{\circ}$ day of March, 2018.

HONORABLE JAMES L. ROBART United States District Judge

Presented by:

s/Keith A. Kemper KEITH A. KEMPER PETER B. DOLAN Attorneys for Plaintiffs

s/ Shaunta M. Knibb SHAUNTA M. KNIBB JEFF SMYTH Attorneys for Defendant

JOINT STIPULATION AND [proposed] ORDER EXTENDING DEADLINE FOR JOINING

ADDITIONAL PARTIES (C17-01794-JLR) - 3

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